

MORRISON LAW GROUP, P.C.
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**IN THE UNITED STATES BANKRUPTCY COURT
DISTRICT OF UTAH**

IN RE:	§	
	§	CASE NO. 21-22653
Jaylene Blair	§	
	§	CHAPTER 13
Debtor(s)	§	

**NOTICE OF ADEQUATE PROTECTION PAYMENTS
UNDER 11 U.S.C. § 1326(a) AND OPPORTUNITY TO OBJECT**

The Debtor states as follows:

1. On 6/16/2021 the Debtor filed a Chapter 13 petition for relief.
2. The Debtor proposes to make Adequate Protection Payments, pursuant to § 1326(a)(1)(C) accruing with the initial plan payment which is due no later than the originally scheduled meeting of creditors under § 341 and continuing to accrue on the first day of each month thereafter, to the holders of the allowed secured claims in the amounts specified below:

Secured Creditor	Description of Collateral	Monthly Adequate Protection Payment Amount	Number of Months to Pay Adequate Protection
APG Financial	2017 Hyundai Sonota	\$131.00	6 Months

3. The monthly plan payments proposed by the Debtor(s) shall include the amount necessary to pay all Adequate Protection Payments and the amount necessary to pay the Trustee's statutory fee.
4. Upon completion of the Adequate Protection Payment period designated herein for each listed secured creditor, the Equal Monthly Plan Payment identified in each Part of the Plan shall be the monthly payment and shall accrue on the first day of each month.
5. This Notice shall govern Adequate Protection Payments to each listed secured creditor unless subsequent Notice is filed by Debtor or otherwise ordered by the Court.
6. Objections, if any, to the proposed Adequate Protection Payments shall be filed as objections to confirmation of the Plan. Objections must be filed and served no later than 7 days before the date set for the hearing on confirmation of the Plan.

Dated this: June 16, 2021

/s/ Theron D. Morrison

Theron D. Morrison
Attorney for Debtors

CERTIFICATE OF MAILING

I hereby certify that a copy of the above document was provided via ECF and U.S. Mail
to the following:

Lon K Jenkins, Chapter 13 Trustee

US Trustee (ECF)

Jaylene Blair
215 E 1530 N
Logan, UT 84341

DATED June 16, 2021.

/s/ Theron D. Morrison
Theron D. Morrison
Attorney for Debtors